

155-07/MBU/LJK

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiff
Sea Consortium Pte. Ltd.
80 Pine Street
New York, NY 10005
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Michael E. Unger (MU 0045)
Lawrence J. Kahn (LK 5215)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SEA CONSORTIUM PTE. LTD.,

Plaintiff,

-against-

HRC SHIPPING LTD.,

Defendants.
-----X

07 CIV 2492 (PAC)

**UNGER AFFIRMATION IN SUPPORT
OF MOTION FOR ATTORNEYS FEES**

MICHAEL E. UNGER, an attorney at law, affirms under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court and am a partner of the law firm of Freehill Hogan & Mahar, LLP, attorneys for Plaintiff SEA CONSORTIUM PTE. LTD. ("SEA CON"). I am not a party to the action, am over 18 years of age and reside at 80 Pine Street, New York, New York. I submit this Affirmation on behalf of SEA CON in support of SEA CON's motion for attorneys fees and disbursements incurred as a result of Defendant HRC SHIPPING LTD. ("HRC-Bangladesh")'s bad faith actions with relation to the disputes between the parties.

2. I make this Affirmation based upon my own personal knowledge.

3. In this action, SEA CON sought to obtain security for its claims against Defendant HRC-Bangladesh. The facts surrounding this dispute have been set forth in

prior declarations submitted on behalf of SEA CON and are incorporated as though set forth at length herein.

4. HRC-Bangladesh's sole appearance in this action was for the purpose of seeking to vacate the attachment properly obtained by SEA CON. At the last minute, and only after SEA CON had been put to the time and expense of responding to HRC-Bangladesh's meritless application, HRC-Bangladesh withdrew its application.

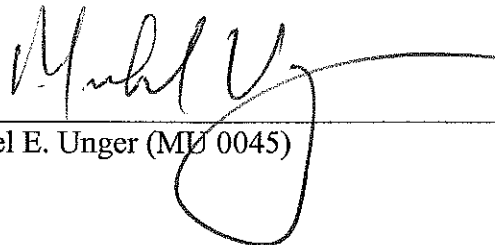
5. As set forth in the accompanying Davidson Declaration, HRC-Bangladesh has utilized similar tactics in other jurisdictions, filing meritless application after meritless application all in an effort to drive up the cost of SEA CON recovering on arbitral awards rendered in SEA CON's favor.

6. The costs incurred by SEA CON in this action in an effort to collect on the award have been substantial as a result of HRC-Bangladesh's actions. The fees and disbursements as set forth in the statements for services attached hereto as Exhibit 1 total \$59,767.93.

7. SEA CON is aware that attorneys fee awards are not often granted by this Court, and SEA CON does not make the instant application for attorneys fees and costs lightly. It is respectfully submitted, though, that HRC-Bangladesh's actions were so abusive, so entirely baseless and drove up the costs of collecting on legitimate arbitral awards to such an extent that a denial of an award of attorneys fees and costs in this instance would do nothing but send a signal to other debtors that such bad faith and harassing actions to avoid payment will be tolerated by the Court without penalty. Creditors' rights, it is further submitted, should not be quashed so readily.

WHEREFORE, SEA CON should be awarded its reasonable costs of collection against HRC-Bangladesh, including but not limited to the reasonable attorneys fees and costs incurred in this action (as set forth in the Exhibit to this Affirmation) as well as in the companion collection actions, as set forth in the accompanying Davidson Declaration.

Dated: New York, New York
March 18, 2008



Michael E. Unger (MJ 0045)

Exhibit 1

Unger Affirmation In Support

LAW OFFICES OF
FREEHILL HOGAN & MAHAR LLP
80 PINE STREET
NEW YORK, N.Y. 10005-1759
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TAX ID NO.: 13-1985797

June 8, 2007

YOUR REF: Please Advise
OUR REF: 155-07/MEU
INTERIM INVOICE # 116842

Sea Consortium Pte. Ltd.
c/o Holman, Fenwick & Willan
3 Church Street
#19-03
Singapore Malaysia 049483
Attn: Dirk Janssen

RE: JAAMI

Attachment against HRC Shipping Ltd. on
behalf of Sea Consortium Pte. Ltd.

TO PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS INCURRED in
connection with the captioned matter from March 23, 2007 through May 31, 2007 as more
particularly described below:

| | | | |
|---------|-----|------|--|
| 3/23/07 | MEU | 1.60 | Conferring with WDM regarding new attachment on behalf of Sea Consortium against HRC Shipping; conducting due diligence search for HRC in New York; investigating HRC activities; writing Mr. Janssen advising we to proceed with preparation of papers; reviewing voluminous documents provided by Mr. Janssen; |
| 3/24/07 | MEU | 1.60 | Reviewing arbitration submissions; |
| 3/26/07 | MEU | 1.60 | Preparing complaint; preparing attachment application; forwarding complaint to Mr. Janssen for review and comment; |
| 3/27/07 | MEU | 1.20 | Receiving and reviewing e-mail from Mr. Janssen forwarding revised |

draft of complaint and instructing to proceed with filing of application; finalizing complaint and attachment application; arranging filing; writing Mr. Janssen regarding same; follow up with Judge Crotty's Chambers and being advised judge unavailable and order likely to be signed tomorrow; writing Mr. Janssen regarding same;

- | | | | |
|---------|-----|------|--|
| 3/27/07 | BGC | 2.60 | Office conference with MEU with regard to attachment proceeding; review pleadings and attending at SDNY for commencement of action and initial appearance before Orders and Judgments clerk for prejudicial review of application and subsequent application for emergency hearing before District Judge; appearance at chambers of Judge Cottey and presentation of application for issuance of order of attachment outlining claim, grounds, etc.; advising MEU of same and provide phone number for chambers and the name of clerk to call; |
| 3/28/07 | MEU | 1.10 | Receiving and reviewing e-mails from Mr. Janssen forwarding copy of award and inquiring regarding ability to use Rule B upon conversion of award to judgment; writing Mr. Janssen responding to same; on Order having been signed; arranging issuance of writ; supervising service of banks; |
| 3/28/07 | RGR | 2.00 | Serve process of attachment, order, verified complaint and cover letter on HSBC Bank, Deutsche Bank, JP Morgan Chase, Bank of New York, Atlantic Bank and American Express Bank; |
| 3/28/07 | CG | 3.00 | Attending at SDNY and obtaining Order from Judge Crotty's Chambers; arranging to have PMAG issued; service of Maritime Attachments on the following garnishee banks: Citibank, Bank of America, ABN Amro Bank and Wachovia Bank; preparation of Affidavits of Service; |
| 3/28/07 | MC | 1.00 | Scanning and e-filing Rule B Attachment papers; preparing 1st day letter to garnishee banks; |
| 3/29/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Janssen forwarding banking information for HRC; writing Mr. Janssen reporting writ issued and banks being served; supervising service of banks; |
| 3/29/07 | JS | .60 | Serve initial pleadings by hand upon garnishee bank Standard Chartered Bank; |
| 3/29/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 4/2/07 - 4/6/07; |

| | | | |
|---------|-----|-----|---|
| 3/29/07 | CG | .50 | Service of Maritime Attachments on BNP Paribas; |
| 3/29/07 | MC | .20 | Preparing and serving 2nd day letter to garnishee banks; |
| 3/30/07 | JS | .30 | Notarize CG affidavits of service; prepare affidavits of service; update chart and circulate to all concerned; |
| 3/30/07 | CG | .10 | Preparation of Affidavits of Service; |
| 3/30/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/01/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen requesting update; writing in reply; |
| 4/02/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen inquiring regarding status; responding to same; |
| 4/02/07 | RGR | .40 | Prepare affidavits of service of attachment and related documents on 3/28/07; |
| 4/02/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/03/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/04/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/05/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 4/9/07 - 4/13/07; |
| 4/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/09/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/10/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/11/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/12/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 4/16/07 - 4/20/07; |

| | | | |
|---------|-----|------|--|
| 4/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/13/07 | MEU | .30 | Receiving and reviewing notice of \$1,560 restrained at Citibank; writing Mr. Janssen suggesting to let go; |
| 4/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/16/07 | MEU | .30 | Conferring by telephone with Standard Chartered regarding \$100,000 restrained; writing Mr. Janssen inquiring regarding whether to hold funds; |
| 4/16/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/17/07 | MEU | 1.00 | Receiving and reviewing e-mail from Mr. Janssen instructing to hold funds at Standard Chartered; writing bank regarding same; writing Mr. Janssen regarding same and procedure for recognition and enforcement of award/judgment; preparing Rule B.2 notice to HRC; preparing waiver of service of complaint to HRC; |
| 4/17/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/17/07 | MC | .30 | Serving Rule B.2 Notice ; preparing and serving Waiver of Service to defendant; |
| 4/18/07 | MEU | .20 | On clarification regarding amount restrained; |
| 4/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/19/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 4/23/07 - 4/27/07; |
| 4/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/23/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Janssen requesting clarification regarding understanding of Rule B attachment procedures in respect to bank reporting, etc.; responding to same; |
| 4/23/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/24/07 | MEU | .20 | Receiving and reviewing e-mail from Mr. Janssen advising he to obtain |

certified copy of award; writing Mr. Janssen inquiring regarding reducing award to judgment in Singapore;

| | | | |
|---------|-----|-----|--|
| 4/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/25/07 | MEU | .10 | Receiving and reviewing e-mail from Mr. Davidson regarding intent to reduce award to judgment in Singapore; |
| 4/25/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/26/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 4/30/07 - 5/4/07; |
| 4/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 4/30/07 | CG | .10 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 4/30/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/01/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/02/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/03/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 5/7/07 - 5/11/07; |
| 5/03/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/04/07 | MEU | .30 | Conferring by telephone with Bank of New York regarding further \$126,900 restrained; instructing to hold funds; advising Mr. Janssen; |
| 5/04/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/07/07 | MEU | .60 | Receiving and reviewing e-mail from attorneys for HRC requesting copy of pleadings; writing HRC attorney forwarding same and advising regarding further \$126k restrained at Bank of New York; conferring by telephone with attorney for HRC regarding appearance and he to take instructions regarding settlement; conferring by telephone with Bank of |

New York regarding further \$10,000 restrained; instructing bank to hold funds; receiving and reviewing confirmation regarding same;

- 5/07/07 CG .10 Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession;
- 5/07/07 MC .10 Serving PMAG on garnishee banks by telefax;
- 5/08/07 MEU 1.10 Receiving and reviewing e-mail from Mr. Janssen regarding certified copy of award and judgment being forwarded; receiving and reviewing e-mail from Bank of New York regarding further \$10,000 representing retainer to HRC attorney restrained; writing Mr. Janssen with suggestion to release funds; receiving and reviewing e-mail from HRC attorney requesting release of funds restrained after WFW designated as agent to receive service and affidavits of service on banks; conferring by telephone with HRC attorney regarding same;
- 5/08/07 CG .10 Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession;
- 5/08/07 MC .10 Serving PMAG on garnishee banks by telefax;
- 5/09/07 MEU 1.00 Receiving and reviewing e-mail from Mr. Janssen forwarding copy of authenticated award and inquiry regarding costs to enforce same; receiving and reviewing e-mail from Mr. Davidson regarding not to release retainer funds; receiving and reviewing e-mail from HRC attorney requesting affidavits of service on banks in respect to restraints; assembling same; writing Messrs. Janssen and Davidson responding to e-mails and advising regarding potential challenge by HRC; forwarding affidavits to HRC attorney;
- 5/09/07 MC .10 Serving PMAG on garnishee banks by telefax;
- 5/10/07 MEU 1.30 Receiving and reviewing e-mail from Mr. Janssen advising regarding HRC challenging Singapore Court order and instructing to proceed on award only; conferring by telephone with HRC attorney regarding claim funds restrained at Bank of New York sent by HRC Singapore; receiving and reviewing telefax from HRC attorney regarding same; receiving and reviewing wire instructions regarding Bank of New York funds; researching connection between HRC Bangladesh and HRC Singapore; considering potential defense to challenge; writing Mr. Janssen regarding same and suggestions for proceeding/defending

challenge;

- 5/10/07 JS .20 Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 5/14/07 - 5/18/07;
- 5/10/07 MC .10 Serving PMAG on garnishee banks by telefax;
- 5/11/07 MEU 1.20 Receiving and reviewing several e-mails from Mr. Janssen providing information and documents to oppose challenge by HRC, including declarations in Singapore, company searches, debit notice, etc.; writing Mr. Janssen providing comments and suggestions for further inquiry; contacting Standard Chartered and seeking confirmation of further wire said to be restrained and wire details regarding all transfers; receiving and reviewing answer of Standard Chartered; receiving and reviewing notarized arbitration award; receiving and reviewing notice of attachment of further \$18,000 at Citibank; instructing to hold funds;
- 5/11/07 MC .10 Serving PMAG on garnishee banks by telefax;
- 5/14/07 MEU .50 Preparing B.2 notice regarding \$18,000 and \$128,014 restraints at Citibank and Standard Chartered; conferring by telephone with HRC attorney regarding status, etc.; writing Mr. Janssen confirming receipt of certified copy of award and reporting on further restraint, etc.;
- 5/14/07 MC .10 Serving PMAG on garnishee banks by telefax;
- 5/15/07 MEU 1.30 Receiving and reviewing e-mail from Mr. Janssen inquiring regarding whether wire for \$128k being sent from HRC Singapore; conferring by telephone with Mr. Janssen regarding same, amending complaint to name HRC Singapore as paying agent, continuing investigation, etc.; preparing amended complaint; on supplemental order and writ; on letter to Judge Crotty regarding same; writing Mr. Janssen reporting on status; on preparation of declaration for Mr. Janssen; receiving and reviewing notice from Bank of New York regarding further \$44k restrained;
- 5/15/07 BGC 1.80 Office conference with LJK with regard to filing of Amended Verified Complaint; attending at SDNY and filing Amended Complaint; appearance at chambers of Judge Crotty and presentation of Amended Complaint, proposed Order and PMAG explaining reasons for amending the original Complaint and making application for issuance of a new order of attachment; advising MEU of same;

| | | | |
|---------|-----|------|---|
| 5/15/07 | LJK | 3.60 | Draft application to court authorizing issuance of Amended Writ to name Singapore entity as paying agent; draft cover letter to court; office conferences with MEU re status and strategy; draft amended verified complaint; assist MEU in drafting report to client; |
| 5/15/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/16/07 | MEU | .10 | Receiving and reviewing notice from Citibank regarding further \$495 restrained; |
| 5/16/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/17/07 | MEU | 1.30 | Receiving and reviewing e-mail from solicitor for HRC Singapore requesting release of funds; writing solicitor rejecting and outlining funds restrained; writing HRC attorney and providing notice of recent restraints; conferring by telephone with HRC New York attorney regarding alleged wrongful attachment arguments and he to seek instructions to file motion; writing Mr. Janssen reporting on same; receiving and reviewing telefax from HRC attorney regarding claimed wrongful attachment; |
| 5/17/07 | BGC | 2.20 | Office conference with MEU with regard to the executed Order; attending at chambers of Judge Crotty and obtaining copy of Order of Attachment; appearance at clerk's office for issuance of Process of Attachment and certification of ancillary Order issued by clerk regarding service of process; advising MEU of same; |
| 5/17/07 | CG | .10 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 5/18/07 | MEU | .70 | Receiving and reviewing e-mail from HRC Singapore solicitor demanding immediate release of funds held at Bank of New York; receiving and reviewing schedule of funds attached from Mr. Janssen; receiving and reviewing e-mail from Mr. Janssen providing further information developed regarding payment to Dan Bunkering, etc.; writing Mr. Janssen forwarding e-mail from HRC Singapore solicitor with suggested course of response and requesting input; |
| 5/18/07 | LJK | 1.10 | Telephone conference with MEU re amending order for attachment; assist in drafting amendments to Verified Complaint, Attachment Order and PMAG; |
| 5/18/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from |

secondary service upon garnishee banks; effectuate service upon garnishee banks for 5/21/07 - 5/25/07;

| | | | |
|---------|-----|------|--|
| 5/18/07 | JS | 2.50 | Serve original process by hand upon garnishee banks, ABN Amro, BNP Paribas, Citibank, Wachovia, Standard Chartered Bank, Bank of America; |
| 5/18/07 | CG | 1.70 | Service of Maritime Attachments on the following garnishee banks: HSBC Bank, Atlantic Bank of New York, American Express Bank, The Bank of New York JPMorgan Chase & Co., and Deutsche Bank; Preparation of Affidavits of Service; |
| 5/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/21/07 | CG | .10 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 5/21/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/22/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen agreeing to response to HRC Singapore attorney; writing HRC Singapore attorney regarding same; |
| 5/22/07 | CG | .10 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 5/22/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/23/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/25/07 | MEU | .50 | Receiving and reviewing telefax from HRC attorney demanding withdrawal of March 27, 2007 Affidavit e telephone conference.; considering response; |
| 5/25/07 | CG | .20 | Daily receipt/review of acknowledgment and confirmation relies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 5/28/07 - 6/1/07 |
| 5/25/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

| | | | |
|---------|-----|------|---|
| 5/29/07 | MEU | 1.60 | Preparing supplemental affidavit regarding amended PMAG to add HRC Singapore; writing Judge Crotty advising regarding HRC complaints regarding failure to advise Court of WFW designation as agent and explaining lack of merit regarding same; writing HRC attorney responding to request for amended complaint, etc.; |
| 5/29/07 | JS | .30 | Prepare affidavits of service; |
| 5/29/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/30/07 | MEU | 1.00 | Redrafting letter to Judge Crotty and HRC attorney; redrafting affidavit; |
| 5/30/07 | CG | .10 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 5/30/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 5/31/07 | MEU | .60 | Writing Mr. Janssen reporting on exchanges with HRC attorney, filing of affidavit, letter to Court, etc. and inquiring regarding amending writ to seek payments naming HRC owned vessels and other paying agents; |
| 5/31/07 | BGC | .80 | Attendance at SDNY to deliver letter to Judge Crotty's chambers; |
| 5/31/07 | JS | .30 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 6/4/07-6/8/07; updating emails to include new agent for service of process for American Express Bank and organization of emails from week 5/21-25; |
| 5/31/07 | CG | .10 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 5/31/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

FEES:

10,337.50

SUMMARY OF PROFESSIONAL SERVICES:

| TIMEKEEPER | HOURS | RATE | AMOUNT |
|----------------------|-------|--------|----------|
| Michael E. Unger | 24.00 | 265.00 | 6,360.00 |
| Barbara G. Carnevale | 7.40 | 125.00 | 925.00 |
| Larry J. Kahn | 4.70 | 205.00 | 963.50 |

| TIMEKEEPER | HOURS | RATE | AMOUNT |
|--------------------|-------|--------|-----------|
| Joan Sorrentino | 5.60 | 125.00 | 700.00 |
| Robert G. Ridenour | 2.40 | 125.00 | 300.00 |
| Christina Gargano | 6.30 | 90.00 | 567.00 |
| Colford, Melissa | 5.80 | 90.00 | 522.00 |
| | 56.20 | | 10,337.50 |

DISBURSEMENTS:

| | | |
|-----------------------------|--------|----------|
| Telephone Expenses | 186.63 | |
| Photocopy Expenses | 91.05 | |
| Courier Service Expenses | 43.36 | |
| Facsimile Expenses | 718.02 | |
| TOTAL DISBURSEMENTS: | | 1,039.06 |

INVOICE TOTALS:

| | | |
|-----------------------|----|-----------|
| FEES: | \$ | 10,337.50 |
| DISBURSEMENTS: | | 1,039.06 |
| INVOICE TOTAL: | \$ | 11,376.56 |

LAW OFFICES OF
FREERILL HOGAN & MAHAR LLP
80 PINE STREET
NEW YORK, N.Y. 10005-1759
TELEPHONE (212) 425-1900
FACSIMILE (212) 425-1901
reception@freehill.com
www.freehill.com

TAX ID NO.: 13-1985797

July 31, 2007

YOUR REF: *please advise*
OUR REF: 155-07/MEU
INTERIM INVOICE # 117154

Sea Consortium Pte. Ltd.
c/o Holman, Fenwick & Willan
3 Church Street
#19-03
Singapore Malaysia 049483
Attn: Dirk Janssen

REVISED

RE: JAAMI

Attachment against HRC Shipping Ltd. on
behalf of Sea Consortium Pte. Ltd.

TO PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS INCURRED in
connection with the captioned matter from June 1, 2007 through June 30, 2007 as more
particularly described below:

| | | | |
|---------|-----|------|---|
| 6/01/07 | LJK | 2.90 | Office conference with MEU re status and strategy in dealing with objections raised by counsel for defendant; assist MEU in drafting affidavit that HRC Singapore could not be "found" for purposes of Rule B; assist MEU in drafting letter to Judge Crotty; |
| 6/01/07 | MEU | .20 | Receiving and reviewing e-mail from Mr. Janssen agreeing to expanding writ to include HRC owned vessels and forwarding list of same; |
| 6/01/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

| | | | |
|---------|-----|------|--|
| 6/04/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/06/07 | MEU | 1.00 | Receiving and reviewing notices of appearance from counsel for HRC; receiving and reviewing e-mail from Mr. Janssen regarding client has authorized seeking amended writ to include HRC vessels; receiving and reviewing answer of HRC and counter claim; receiving and reviewing HRC letter to Judge Castel requesting hearing on vacature application; receiving and reviewing order setting hearing for June 12 and exchange of briefs on June 11; conferring with LJK regarding response to HRC arguments; |
| 6/06/07 | LJK | .40 | Review filings by opposing counsel; office conference with MEU re client instructions re further targets for attachment, discussing difficulties and assisting MEU in drafting response to client; |
| 6/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/07/07 | MEU | 4.20 | Preparing answer to HRC counterclaims; writing Mr. Janssen reporting on status; serving amended complaint; preparing declarations for Mr. Janssen and Sea Con in opposition to HRC motion to vacate; conferring with LJK regarding strategy and preparation of memo of law, etc.; |
| 6/07/07 | LJK | 1.40 | Office conference with MEU re court order requiring exchange of briefs; assist MEU in preparing declaration outlines for Janssen and Kong; assist MEU in drafting report to clients; begin outline of memorandum of law; |
| 6/07/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/08/07 | MEU | 8.10 | Receiving and reviewing e-mails from Mr. Janssen forwarding revised declarations and query regarding proceeding; redrafting declarations; forwarding to Mr. Janssen for signing and responding to query; preparing Unger Affirmation in opposition to motion; drafting memo of law in opposition; conferring with LJK regarding same, presentation, etc.; |
| 6/08/07 | LJK | 4.90 | Assist MEU in drafting Unger Affirmation; assist MEU in revising Janssen and Kong Declarations following exchange with clients; draft, revise and edit Memorandum of Law in opposition to motion to vacate; |
| 6/08/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from |

secondary service upon garnishee banks; effectuate service upon garnishee banks for 6/11/07-6/15/07;

| | | | |
|---------|-----|------|--|
| 6/08/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/11/07 | MEU | 2.20 | Receiving and reviewing e-mail from Mr. Janssen forwarding signed declarations; finalizing Unger Affirmation; instructing regarding citations to declarations in memo of law; on exchanges with HRC attorney regarding filing/exchange of papers; conferring by telephone with plaintiff's attorney regarding submission to Judge Castel a mistake and HRC to reapply to Judge Crotty; writing HRC attorney confirming same; writing Mr. Janssen reporting on status, etc.; on letter to Judge Castel confirming status and inquiring regarding need to attend hearing; receiving and reviewing letter from HRC attorney to Judge Castel requesting hearing, etc.; |
| 6/11/07 | LJK | 1.60 | Office conference with MEU re status; review letter by opposing counsel re mistake in applying for relief to wrong judge; draft letter to Court; revise declarations of Janssen and King per discussions and assist MEU in forwarding revised versions for further review and editing; draft status letter to clients with MEU; |
| 6/11/07 | JPG | 2.80 | Review Declarations of Kong and Janssen; updating Memorandum of Law re: citations to Declarations; |
| 6/11/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/12/07 | MEU | 2.40 | Finalizing opposition brief; receiving and reviewing e-mail from Mr. Janssen acknowledging ours; on numerous exchanges with HRC's attorney and Court regarding schedule for motion briefing and hearing, etc.; exchanging briefs and supporting documents; reviewing HRC papers; conferring with LJK regarding reply; writing Mr. Janssen reporting on developments, HRC arguments, etc.; investigating website cited by HRC and outlining arguments in reply; |
| 6/12/07 | LJK | .60 | Multiple emails with counsel for defendant re scheduling of hearing; draft, revise and edit Memorandum of Law in opposition to motion to vacate; review opposition's submissions; assist MEU in drafting status update to clients; |
| 6/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/13/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen responding to ours of June 12, 2007 regarding need for evidence of corporate distinction |

between Sea Con and Bangladesh agent; receiving and reviewing e-mail from Court regarding briefing schedule approved but Court not available June 28/29;

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| 6/13/07 | LJK | .80 | Office conference with MEU re strategy for responding to defendant's submissions; review email from Mr. Janssen re same; |
| 6/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/14/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 6/18/07-6/22/07; |
| 6/14/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/15/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/18/07 | MEU | .80 | Receiving and reviewing e-mails from Mr. Janssen reporting regarding English High Court has rejected challenges to jurisdiction of arbitrator and refused to grant permission to appeal; on information regarding HRC bank; draft order, etc.; |
| 6/18/07 | LJK | .90 | Review emails from client in defense of attachment concerning corporate relationships between Sea Con and its agents and related matters; email exchange with opposing counsel re adjourned date for hearing; |
| 6/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/19/07 | LJK | 1.10 | Email exchange with Mr. Janssen re strategy in responding to motion to vacate attachment, reviewing misstatements of defendant's counsel; office conference with JPG reviewing and revising motion to recognize and enforce foreign arbitral awards as judgment; |
| 6/19/07 | JPG | 3.50 | Review of file and drafting motion to recognize and enforce award; |
| 6/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/20/07 | MEU | .40 | On scheduling oral argument for July 18, 2007; |
| 6/20/07 | LJK | 5.20 | Email exchanges with opposing counsel re still further adjourned hearing date; draft confirming letter to court; begin draft of Kong and Janssen Reply Declarations; |

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| 6/20/07 | JPG | 7.10 | Preparing Janssen Declaration, Memo of Law, Statement of Damages, and Exhibits. |
| 6/20/07 | RGR | .30 | Open firm docket and record necessary information; docket hearing before Judge Crotty on 7/18/07; |
| 6/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/21/07 | MEU | 1.00 | On preparation of reply declarations of Seacon and Mr. Janssen; |
| 6/21/07 | LJK | 7.00 | Continue drafting Kong and Janssen Declarations; research and begin drafting Reply Memorandum of Law; |
| 6/21/07 | JPG | 4.50 | Update, prepare and revise motion papers; additional review of file; drafting Unger Reply Affirmation; |
| 6/21/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 6/25/07-6/29/07; |
| 6/21/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 6/21/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/22/07 | LJK | 2.10 | Finalize Kong and Janssen Reply Declarations; email exchange with Mr. Janssen re same; continue research and drafting memorandum of law; |
| 6/22/07 | JPG | 3.50 | Revise Unger Reply Declaration and Memo of Law. Legal research re: recovery of legal fees |
| 6/22/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/25/07 | MEU | 3.80 | Receiving and reviewing e-mail from Mr. Janssen forwarding signed declarations, etc.; finalizing reply papers; arranging filing; reviewing motion to confirm award and revising same; on sending declaration to Mr. Janssen for review and signing; |
| 6/25/07 | LJK | 5.80 | Review finalized declarations; revise, edit, research and draft memorandum of law; e-file reply papers; office conference with MEU re decision by defendant not to submit opposition/reply of its own; email status report to Mr. Janssen and also forward proposed |

declaration for review/comment on motion to confirm arbitral awards; also provide advice on recovery of attorney fees and costs due to bad faith failure to pay on award;

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| 6/25/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/26/07 | MEU | 1.00 | Receiving and reviewing e-mail from Mr. Janssen responding to costs inquiry; conferring with LJK regarding revisions to declarations, etc.; on reply to Mr. Janssen's queries; receiving and reviewing telefax from HRC attorney to Court withdrawing motion to vacate; writing Mr. Janssen regarding same; conferring with LJK regarding impact on motion to confirm; |
| 6/26/07 | LJK | 1.30 | Review email from Mr. Janssen with further inquiries; draft responses; review notice of withdrawal of challenge to attachment; assist MEU in drafting report to Mr. Janssen; |
| 6/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/27/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Janssen regarding desire to move forward swiftly without waiting for costs issues to be resolved; conferring with LJK regarding reply; |
| 6/27/07 | LJK | 1.90 | E-mail exchange with Mr. Janssen regarding declaration; review English High Court Order; office conference with MEU regarding possible settlement and further handling; review withdrawal of application by defendant; e-mail to Mr. Janssen regarding status and answering queries related to withdrawal; further discussions with Mr. Janssen regarding motion to confirm arbitral awards; |
| 6/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/28/07 | MEU | 1.50 | Receiving and reviewing order endorsing HRC withdrawal of motion to vacate; receiving and reviewing e-mail from Mr. Janssen forwarding revised declaration, etc.; finalizing motion to confirm awards; preparing cover letter to Judge Crotty regarding same; serving motion papers; writing Mr. Janssen forwarding copy of motion and Court confirmation of withdrawal, advising regarding effect of same; |
| 6/28/07 | LJK | .40 | Office conference with MEU regarding costs of U.S. proceedings; e-mail exchange with Mr. Janssen responding to inquiries; finalize motion to recognize/confirm arbitral awards and e-file same; |
| 6/28/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories |

requesting information about defendant's assets in garnishee's possession;

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| 6/28/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 6/29/07 | MEU | .60 | Review HRC attorney's acknowledgment of motion; review email from Mr. Janssen inquiring re dismissal, etc; responding to same, and providing advice re absolutely to receiver cost of NY action and quantum, etc; |
| 6/29/07 | LJK | .70 | Review e-mail inquiries from Mr. Janssen and draft response; review same with MEU; |
| 6/29/07 | RGR | .80 | Deliver letter to Judge Crotty regarding termination of motion to vacate, and the filing of motion to enforce award; |
| 6/29/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 7/2/07-7/6/07; |
| 6/29/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

FEES:

19,168.00

SUMMARY OF PROFESSIONAL SERVICES:

| TIMEKEEPER | HOURS | RATE | AMOUNT |
|--------------------|-------|--------|-----------|
| Michael E. Unger | 27.90 | 265.00 | 7,393.50 |
| Larry J. Kahn | 39.00 | 205.00 | 7,995.00 |
| Gisholt, Jan P. | 21.40 | 155.00 | 3,317.00 |
| Joan Sorrentino | .80 | 125.00 | 100.00 |
| Robert G. Ridenour | 1.10 | 125.00 | 137.50 |
| Christina Gargano | .40 | 90.00 | 36.00 |
| Colford, Melissa | 2.10 | 90.00 | 189.00 |
| | 92.70 | | 19,168.00 |

DISBURSEMENTS:

| | | |
|-----------------------------|--------|--------|
| Facsimile Expenses | 752.15 | |
| Photocopy Expenses | 25.05 | |
| TOTAL DISBURSEMENTS: | | 777.20 |

INVOICE TOTALS:

| | |
|----------------|--------------|
| FEES: | \$ 19,168.00 |
| DISBURSEMENTS: | 777.20 |
| INVOICE TOTAL: | \$ 19,945.20 |

WIRE TRANSFER DETAILS:

Citibank, N.A.
120 Broadway
New York, NY 10271
SWIFT Code: CITIUS33
ABA No.: 021 000 089
FOR THE ACCOUNT OF
FREEHILL HOGAN & MAHAR
Account No. : 24589366
U.S. Dollars
Tax ID NO.: 13-1985797

LAW OFFICES OF
FREEHILL HOGAN & MAHAR LLP
80 PINE STREET
NEW YORK, N.Y. 10005-1759
TELEPHONE (212) 425-1900
FACSIMILE (212) 425-1901
reception@freehill.com
www.freehill.com

TAX ID NO.: 13-1985797

December 4, 2007

YOUR REF: *please advise*
OUR REF: 155-07/MEU
INTERIM INVOICE # 118291

Sea Consortium Pte. Ltd.
c/o Holman, Fenwick & Willan
3 Church Street
#19-03
Singapore 049483
Attn: Dirk Janssen

RE: JAAMI

Attachment against HRC Shipping Ltd. on
behalf of Sea Consortium Pte. Ltd.

TO PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS INCURRED in
connection with the captioned matter from July 1, 2007 through November 30, 2007 as more
particularly described below:

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| 7/02/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Janssen regarding agreement to suggested course of action; receiving and reviewing original declaration, etc. from Mr. Janssen; acknowledging receipt; |
| 7/02/07 | LJK | .20 | Review email from Mr. Janssen continuing instructions; |
| 7/02/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/03/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen forwarding English High Court Order on leave to appeal; |

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| 7/03/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/05/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 7/9/07-7/13/07; |
| 7/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/06/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 7/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/09/07 | MEU | .20 | Receiving and reviewing notice from Bank of New York regarding further \$9,555 sent by Zim to HRC Singapore restrained; instructing bank to hold funds; |
| 7/09/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/10/07 | MEU | .30 | Writing Mr. Janssen advising regarding \$9,555 restrained at Bank of New York; writing HRC attorney regarding same; receiving and reviewing acknowledgment; |
| 7/10/07 | LJK | .40 | Review email re restraint of additional funds sent by Zim; review response from DJ; office conference with MEU re same; assist MEU in drafting response; |
| 7/10/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/11/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen regarding WFW not receiving instructions from HRC; writing in reply; |
| 7/11/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/12/07 | LJK | .20 | Preparing fax to court re status; |
| 7/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/13/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 7/16/07-7/20/07; |

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| 7/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/16/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/17/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/18/07 | LJK | .30 | Email exchange with opposing counsel re scheduling; |
| 7/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/19/07 | MEU | .40 | Receiving and reviewing order from Court regarding scheduling conference on motion to confirm; writing HRC attorney regarding scheduling; receiving and reviewing e-mail from HRC attorney regarding he to advise regarding availability; |
| 7/19/07 | LJK | .20 | Email exchange with opposing counsel and with court re scheduling; |
| 7/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/20/07 | MEU | .60 | On exchanges with HRC attorney regarding availability for conference; writing Court regarding available dates for counsel; receiving and reviewing notice Court to hold conference on motion to confirm July 24, 2007; |
| 7/20/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 7/23/07-7/27/07; |
| 7/20/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 7/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/23/07 | MEU | .20 | Conferring by telephone with Deutsche Bank regarding possible wire to be restrained and instructing to release same; |
| 7/23/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/24/07 | MEU | 2.30 | Conferring by telephone with Deutsche Bank regarding \$50 wire sent to HRC Shipping Bdn Sdh and instructing to let go; preparing for and attending at conference before Judge Crotty regarding motion to confirm; writing Mr. Janssen regarding conference, funds at Deutsche Bank and HRC vessel said to have been arrested and requesting |

clarification; receiving and reviewing e-mail from HRC attorney forwarding Singapore arrest papers; passing to Mr. Janssen;

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| 7/24/07 | LJK | .40 | Assist MEU in drafting status report to client; |
| 7/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/25/07 | MEU | .20 | Receiving and reviewing e-mail from Mr. Janssen regarding Singapore vessel seizure; |
| 7/25/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/27/07 | MEU | 1.60 | Receiving and reviewing e-mail from Mr. Janssen forwarding Singapore arrest papers and providing comments regarding same, HRC Malaysia payments, etc.; writing Mr. Janssen in reply; receiving and reviewing e-mail from Mr. Janssen regarding request to name HRC Sri Lanka as paying agent in addition to HRC Malaysia; preparing second amended complaint, order and second amended writ; preparing cover letter to Judge Crotty requesting issuance of order under seal, etc.; |
| 7/27/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 7/30/07-8/03/07; |
| 7/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/30/07 | MEU | .40 | Finalize cover letter to Judge Crotty; instructing regarding submission; conferring with BGC regarding status; |
| 7/30/07 | BGC | 1.30 | Office conference with MEU with regard to Amended Complaint which includes additional paying agents and proposed Order to reflect same; appearance at chambers of Judge Crotty and presentation of letter of explanation and request for sealing of the documents once Order executed; advise MEU of same; |
| 7/30/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 7/31/07 | MEU | .50 | Receiving and reviewing order denying application to proceed with second amended complaint ex parte; considering options; writing Mr Janssen reporting on same; |

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| 7/31/07 | BGC | .20 | Provide MEU with additional copies of Order and PMAG for filing awaiting call from Judge Crotty regarding Order; |
| 7/31/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 7/31/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/01/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/02/07 | MEU | .40 | Receiving and reviewing telefax to HRC Shipping attorney to Court requesting hearing regarding motion to vacate; instructing LJK regarding response and handling; conferring with LJK and reviewing responsive fax to Court; |
| 8/02/07 | LJK | .60 | Draft fax to Court re briefing schedule for motion by HRC-Singapore; review fax to court from opposing counsel; |
| 8/02/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 8/6/07-8/10/07; |
| 8/02/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/03/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/04/07 | MEU | .30 | Writing Mr. Janssen reporting on HRC Singapore motion to vacate, etc.; |
| 8/06/07 | MEU | 1.20 | Receiving and reviewing order approving motion schedule regarding HRC Singapore motion to vacate; receiving and reviewing notice from Court to agree as to oral argument date; conferring with HRC attorney regarding same; writing Court regarding agreed hearing on August 21; writing Mr. Janssen regarding status; |
| 8/06/07 | LJK | .50 | Telephone calls and emails scheduling hearing and briefing schedule; assist MEU in drafting report to client; |
| 8/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/07/07 | MEU | .20 | Receiving and reviewing e-mail from Court inquiring regarding length of hearing and witnesses; writing HRC attorney regarding same; |

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| 8/07/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/08/07 | MEU | .40 | Receiving and reviewing e-mail from HRC attorney regarding claim Sea Con over-secured due to arrest of vessel, etc.; writing in response; writing Court regarding hearing date and time, confirmed, witnesses, etc.; |
| 8/08/07 | LJK | .80 | Email exchange with MEU and opposing counsel to respond to inquiry from court re scheduling for hearing; participate in telephone conference with MEU and Mr. Janssen re arrest of BANGA BORAT; email exchange with opposing counsel re same; |
| 8/08/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/09/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/10/07 | MEU | 2.90 | Receiving and reviewing HRC Singapore papers in support of motion to vacate; forwarding to Mr. Janssen for review; drafting Unger Affidavit. Janssen declaration, Kong declaration, Memo of Law in opposition; |
| 8/10/07 | LJK | 1.30 | Review motion to vacate attachment by HRC - Singapore; office conference with MEU re same; |
| 8/10/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 8/13/07-8/17/07; |
| 8/10/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/11/07 | LJK | .30 | Review email from MEU to client re status; email from MEU re transmission error; attempt to re-send to Mr. Janssen; |
| 8/13/07 | MEU | 2.10 | Outlining opposition to HRC Singapore motion; preparing declarations for Mr. Janssen and Mr. Kong in opposition; writing Mr. Janssen forwarding same for review; conferring by telephone with WFW regarding HRC Bangladesh not to contest motion to confirm awards but reserves right to move to vacate based on alleged over security due to arrest of BANGA BORAT; receiving and reviewing e-mail from WFW with appraised value of vessel and letter to Court regarding same; receiving and reviewing e-mail from WFW regarding HRC Singapore to press ahead with its motion; informing Mr. Janssen; |

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| 8/13/07 | LJK | .40 | Review letter response of HRC-Bangladesh to motion to confirm arbitral award; assist MEU in drafting report to client; |
| 8/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/14/07 | MEU | 5.30 | Conferring by telephone with Mr. Janssen regarding status of efforts to sell BANGA BORAT, new vessel arrest by HRC, possible new Rule B regarding arrest, revisions to declaration, etc.; receiving and reviewing Mr. Janssen's corrections to declaration; receiving and reviewing e-mail from Mr. Janssen forwarding papers regarding new arrest; redrafting declarations and send to Mr. Janssen for signing; preparing memo of law in opposition; conferring with LJK regarding status, motion, etc.; |
| 8/14/07 | LJK | 2.90 | Draft Janssen declaration in opposition to HRC-S. motion to vacate; review email response from Mr. Janssen; begin draft of memorandum of law; office conference with MEU re strategy; |
| 8/14/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/15/07 | MEU | 4.30 | Receiving and reviewing e-mail from Mr. Janssen forwarding signed Kong declaration; conferring by telephone with Mr. Janssen regarding changes to his declaration to be used in reply to HRC argument regarding over-security; receiving and reviewing revised Janssen declaration; preparing exhibits to Kong declaration; finalizing Unger affirmation; finalizing memo of law; arranging filing; forwarding same to HRC attorney; studying papers regarding HRC arrest of DA LI in Bangladesh in preparation for hearing; |
| 8/15/07 | LJK | 3.40 | Email exchange with Mr. Janssen re declarations of Mr. Janssen and Kong; office conference with MEU re same; revise and edit memorandum of law; e-file opposition papers; |
| 8/15/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/16/07 | MEU | 1.00 | Redrafting Janssen declaration in response to allegation of over-security; forwarding to Mr. Janssen; writing Judge Crotty forwarding same; |
| 8/16/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 8/20/07-8/24/07; |
| 8/16/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 8/17/07 | MEU | 1.40 | Conferring by telephone with Mr. Janssen regarding revisions to declaration; finalizing and filing same; receiving and reviewing HRC reply papers; |
| 8/17/07 | LJK | 2.20 | Review and revise Mr. Janssen declaration; draft letter to court; draft proposed order; email exchanges with Mr. Janssen; e-file reply on motion to confirm arbitral awards; review reply papers filed by HRC-Singapore; |
| 8/17/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/18/07 | MEU | .90 | Receiving and reviewing HRC reply brief; forwarding to Mr. Janssen with comments; |
| 8/20/07 | MEU | 1.60 | Receiving and reviewing e-mail from Mr. Janssen regarding update as to attachment of HRC Singapore property; preparing for hearing; |
| 8/20/07 | LJK | .70 | Review email from Mr. Janssen re recent events in Singapore related to arrest of BANGA BORAT; office conference with MEU re same; |
| 8/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/21/07 | MEU | 2.60 | Preparing for and attending at hearing before Judge Crotty on motion to confirm awards and HRC Singapore motion to vacate; writing Mr. Janssen reporting on same; |
| 8/21/07 | LJK | .40 | Telephone conference with MEU re results of hearing before Judge Crotty; |
| 8/21/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/22/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/23/07 | MEU | .40 | On new decision sustaining attachment of paying agent funds; on letter to Judge Crotty providing same and further support to argument regarding estoppel due to HRC Bangladesh admission funds belong to it; |
| 8/23/07 | LJK | 1.40 | Review Essar decision regarding paying agent and draft letter to Judge Crotty for the court's additional considerations; |
| 8/23/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 8/27/07-8/31/07; |

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| 8/23/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/24/07 | CG | .80 | Hand deliver letter to Judge Crotty; |
| 8/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/27/07 | MEU | .10 | Receiving and reviewing e-mail from Judge Crotty's chambers regarding hearing adjourned from August 29 to September 10; |
| 8/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/28/07 | MEU | .20 | Writing Mr. Janssen regarding adjournment of conference, etc.; |
| 8/28/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/29/07 | MEU | .50 | Receiving and reviewing e-mail from Mr. Janssen regarding status of vessel auction and losses due to arrest of Da Li up to \$680k; considering need for new Rule B action to secure same; ordering transcript of 8/21 hearing before Judge Crotty; |
| 8/29/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/30/07 | MEU | .40 | Receiving and reviewing inquiry from Court regarding sale of BORGA BORAT; responding to same; receiving and reviewing e-mail from HRC attorney to Court regarding same; |
| 8/30/07 | LJK | .70 | Assist MEU in drafting report to court on status of action in Singapore re sale of BANGA BORAT; review report on same submitted by opposing counsel; office conference with MEU re same; |
| 8/30/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 8/31/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 9/3/07-9/7/07; make changes to each individual service email 8/27-31 per Amex Bank's instructions to add Rodd Corner for the week in Mary's absence; |
| 8/31/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 8/31/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 9/04/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/06/07 | MEU | .20 | Conferring by telephone with HRC attorney regarding adjourning hearing set for 9/10; |
| 9/06/07 | JS | .20 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; effectuate service upon garnishee banks for 9/10/07-9/14/07; |
| 9/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/07/07 | MEU | .60 | Conferring by telephone with HRC attorney regarding adjourning conference set for 9/10; writing Judge Crotty regarding same; forwarding draft to HRC attorney; reviewing and receiving approval; sending to Court; receiving and reviewing e-mail from Judge Crotty's clerk regarding Court to issue order on 9/10; |
| 9/07/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/10/07 | MEU | .30 | Receiving and reviewing order adjourning hearing to 10/2; writing Mr. Janssen regarding same; |
| 9/10/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/11/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Davison updating regarding status of vessel arrests and instructing to oppose further adjournments of motion; writing Mr. Davison confirming and providing comments; |
| 9/11/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/12/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 9/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/13/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 9/17/07-9/21/07; |
| 9/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 9/14/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/17/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/20/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 9/24/07-9/28/07; add Standard Chartered to all new electronic service; |
| 9/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/21/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/25/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Janssen forwarding affidavit of HRC Singapore wherein relationship with HRC Bangladesh is described; |
| 9/25/07 | LJK | .20 | Review email from Mr. Janssen; |
| 9/25/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/26/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 9/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/27/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 10/1/07-10/5/07; add additional person on service list for Citibank; |
| 9/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 9/28/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/01/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 10/02/07 | MEU | 1.70 | Preparing for and attending at further conference before Judge Crotty whereat Court agreed to enter judgment and directed parties to report regarding status of vessel sale with motion to vacate to be held in abeyance; writing Mr. Janssen reporting on conference; |
| 10/02/07 | LJK | 1.60 | Prepare for hearing; office conference with MEU reviewing status and discussing strategy; participate in hearing; assist MEU in drafting report to clients re status; |
| 10/02/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/03/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen regarding sale of vessel not likely for several months, etc.; |
| 10/03/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/04/07 | MEU | .60 | Conferring by telephone with HRC attorney regarding settlement supposedly in the works; inquiring of Mr. Janssen regarding status; receiving and reviewing e-mail from Mr. Davison regarding not to accept HRC version; responding regarding need for update so as to be in position to report to Court; receiving and reviewing same from Mr. Davison; |
| 10/04/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 10/8/07-10/12/07; |
| 10/04/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/05/07 | MEU | .10 | Receiving and reviewing order directing entry of judgment; and judgment; |
| 10/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/08/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/09/07 | MEU | .30 | Conferring by telephone with HRC attorney regarding he to advise Court regarding status of settlement discussions and sale of vessel; receiving and reviewing copy of HRC letter to Judge Crotty; |
| 10/09/07 | LJK | .40 | Review letter to Court from opposing counsel; office conference with MEU re same; |

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| 10/09/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/10/07 | MEU | 1.80 | Forwarding HRC attorney letter to HFW; conferring by telephone with Mr. Janssen regarding new action to secure claims for latest wrongful arrest; receiving and reviewing e-mail from Mr. Davison with comments regarding HRC letter to Court and providing schedule of claims; preparing complaint and attachment application regarding arrest of DA LI; preparing letter to Judge Crotty in reply to that of HRC; conferring with LJK regarding process in going forward, etc.; |
| 10/10/07 | LJK | 1.20 | Assist MEU in drafting letter to court; office conference with MEU discussing strategy for second action; |
| 10/10/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/11/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 10/15/07-10/19/07; |
| 10/11/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/12/07 | MEU | 1.20 | Receiving and reviewing e-mail from Mr. Janssen forwarding arbitration submissions regarding DA LI claim; preparing new complaint and attachment papers; |
| 10/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/15/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/16/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/17/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/18/07 | MEU | 1.20 | Redrafting complaint for security regarding arrest of DA LI, etc.; forwarding to Mr. Janssen for review; |
| 10/18/07 | LJK | 2.10 | Office conference with MEU discussing legal strategy; begin drafting complaint for second action; |
| 10/18/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 10/22/07-10/26/07 & 10/29/07; |
| 10/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 10/19/07 | LJK | 3.80 | Continue drafting and revising Rule B pleadings; office conference with MEU re same for second action; discuss also contents of letter to Judge Crotty; |
| 10/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/22/07 | MEU | .80 | Receiving and reviewing e-mail from Mr. Janssen with comments regarding draft complaint; receiving and reviewing telefax from HRC attorney suggesting BANGA BORAT buyer found and requesting confirmation so as to alert Court; writing Mr. Janssen forwarding same, requesting comments and confirmation regarding security held by Sea Con; |
| 10/22/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/23/07 | MEU | 1.50 | Receiving and reviewing multiple e-mails from Mr. Janssen regarding sale of BANGA BORAT status, funds restrained, changes to draft complaint, etc.; conferring by telephone with Mr. Janssen regarding same and strategy regarding filing of 2nd action and to agree to await sale regarding 1st action, etc.; finalizing 2nd attachment application; arranging for filing; writing HRC attorney responding to private sale of vessel advice and providing list of funds restrained; on exchanges with HRC attorney and Court regarding need for further hearing and suggesting further report 11/12; |
| 10/23/07 | BGC | 1.60 | Office conference with MEU with regard to related attachment action before Judge Crotty; attendance at SDNY for commencement of action and initial appearance before the Orders and Judgments clerk for pre-judicial review of application and subsequent application for emergency hearing before Judge Crotty; appearance at chambers of Judge Crotty and presentation of application for issuance of order of attachment outlining claim, grounds, etc.; advise MU of same; |
| 10/23/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/24/07 | MEU | .90 | Receiving and reviewing email from Court clerk to Judge Crotty inquiring regarding sale date for vessel; writing in reply regarding no dates set and outlining timeframes and procedure; on attachments issues regarding second action; advising Mr. Janssen; arranging for service; |
| 10/24/07 | BGC | 1.60 | Attending at Judge Crotty's chambers and obtaining executed court order for issuance of attachment; appearance at clerk's office for |

issuance of Process of Attachment and certification of ancillary Order issued by the clerk regarding service of process; advise MU of same;

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| 10/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/25/07 | MEU | .60 | On 2nd action application granted; supervising service of banks; writing Mr. Janssen regarding same; preparing special cover letter to banks regarding security held in action 1 to be held regarding action 2; |
| 10/25/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/26/07 | RGR | .50 | Serve process of attachment, order, verified complaint and cover letter on HSBC Bank, Deutsche Bank, The Bank of New York and JP Morgan Case; |
| 10/26/07 | CG | 1.50 | Service of Maritime Attachments on the following garnishee banks: ABN Amro Bank, Bank of America, American Express Bank, Citibank, Wachovia, BNP Paribas and Standard Chartered Bank; |
| 10/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/28/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 10/30/07-11/02/07; |
| 10/29/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Janssen regarding vessel to be sold 11/16 and providing copy of sheriff's notice, order, etc.; conferring with LJK regarding status and need for B.2 notice to HRC; reviewing and approving same; |
| 10/29/07 | LJK | .40 | Preparing Rule B(2) notice in second action to HRC attorney; |
| 10/29/07 | RGR | .30 | Prepare affidavits of service of attachment and related documents on banks on 10/26/07; |
| 10/29/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/29/07 | MC | .30 | Preparing and serving 2nd day letter in second action on garnishee banks by telefax; |
| 10/30/07 | MEU | .50 | Receiving and reviewing email from Mr. Janssen regarding seizure of BANGA BOTAR and forwarding relevant documents; |
| 10/30/07 | LJK | .30 | Review email from DJ discussing developments in Singapore; |

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| 10/30/07 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 10/30/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/30/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 10/31/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 10/31/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/01/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 11/05/07 -11/09/07; |
| 11/01/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/01/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/02/07 | MEU | .30 | Receiving and reviewing email from HRC attorney to court detailing developments and position regarding restraint of funds in second action, etc; |
| 11/02/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/02/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/05/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/06/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/07/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/07/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/08/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/08/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 11/09/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/09/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/10/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 11/12/07 -11/16/07; |
| 11/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/12/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/13/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/14/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/14/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/15/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/15/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/16/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 11/19/07 -11/23/07; |
| 11/16/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/16/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/19/07 | MEU | .20 | Conferring by telephone with Deutsche Bank regarding wire to HRC Shipping and instructing to release same; |
| 11/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/19/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/20/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 11/21/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/21/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/23/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 11/26/07 -11/30/07; |
| 11/23/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/23/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/26/07 | MEU | .70 | Conferring by telephone with HRC attorney regarding sale of BANGA BORAT; receiving and reviewing email from HRC attorney forwarding document regarding sale; forwarding to Mr. Janssen and requesting update; |
| 11/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/26/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/27/07 | MEU | .50 | Receiving and reviewing email from Mr. Janssen regarding status of sale and continued week for NY security and providing copies of Singapore filing by HRC; |
| 11/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/27/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/28/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/28/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 11/29/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 12/3/07 -12/7/07; |
| 11/29/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 11/29/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

FEES:

22,036.50

SUMMARY OF PROFESSIONAL SERVICES:

| TIMEKEEPER | HOURS | RATE | AMOUNT |
|----------------------|--------|--------|-----------|
| Michael E. Unger | 49.30 | 265.00 | 13,064.50 |
| Larry J. Kahn | 27.30 | 205.00 | 5,596.50 |
| Barbara G. Carnevale | 4.70 | 165.00 | 775.50 |
| Joan Sorrentino | 3.20 | 125.00 | 400.00 |
| Robert G. Ridenour | .80 | 125.00 | 100.00 |
| Christina Gargano | 3.70 | 90.00 | 333.00 |
| Colford, Melissa | 12.80 | 90.00 | 1,152.00 |
| | 101.80 | | 21,421.50 |

DISBURSEMENTS:

| | | |
|--------------------------------|--------|----------|
| OnLine Research Expenses | 51.61 | |
| Deposition Transcript Expenses | 38.60 | |
| Telephone Expenses | 820.82 | |
| Court Filing Fees | 355.68 | |
| Photocopy Expenses | 134.10 | |
| Facsimile Expenses | 648.96 | |
| TOTAL DISBURSEMENTS: | | 2,049.77 |

INVOICE TOTALS:

| | |
|-----------------------|---------------------|
| FEES: | \$ 21,421.50 |
| DISBURSEMENTS: | 2,049.77 |
| INVOICE TOTAL: | \$ 23,470.77 |

WIRE TRANSFER DETAILS:

Citibank, N.A.
 120 Broadway
 New York, NY 10271
 SWIFT Code: CITIUS33
 ABA No.: 021 000 089
 FOR THE ACCOUNT OF
 FREEHILL HOGAN & MAHAR
 Account No. : 24589366
 U.S. Dollars
 Tax ID NO.: 13-1985797

LAW OFFICES OF
FREEHILL HOGAN & MAHAR LLP
80 PINE STREET
NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

FACSIMILE (212) 425-1901

reception@freehill.com

www.freehill.com

TAX ID NO.: 13-1985797

March 17, 2008

YOUR REF: *please advise*
OUR REF: 155-07/MEU
INTERIM INVOICE # 119299

Sea Consortium Pte. Ltd.
c/o Holman, Fenwick & Willan
3 Church Street
#19-03
Singapore Malaysia 049483
Attn:

RE: JAAMI

Attachment against HRC Shipping Ltd. on
behalf of Sea Consortium Pte. Ltd.

TO PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS INCURRED in
connection with the captioned matter from December 1, 2007 through February 29, 2008 as more
particularly described below:

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| 12/03/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/03/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/04/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/04/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/05/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/05/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 12/06/07 | MEU | 1.00 | Receiving and reviewing e-mail from HRC attorney forwarding bill of sale on BANGA BORAT and requesting reconciliation regarding security and amounts already recovered and still owed so as to discuss continued need for New York action; receiving and reviewing HRC attorney letter to Court regarding sale and parties to attempt to agree figures, etc.; receiving and reviewing e-mail from Mr. Janssen regarding HRC challenging mortgagee bank's claim and resulting delay in release of funds, etc.; writing Mr. Janssen forwarding HRC correspondence and seeking clarification; |
| 12/06/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/06/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/07/07 | MEU | .40 | Receiving and reviewing e-mail from Mr. Davidson inquiring regarding procedure for enforcement; writing Mr. Davidson with comments regarding same; |
| 12/07/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 12/10/07 -12/14/07; |
| 12/07/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/07/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/10/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/10/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/11/07 | MEU | .90 | Receiving and reviewing e-mail from Mr. Davidson instructing to proceed with efforts to collect judgment against restrained funds; receiving and reviewing e-mail from HRC attorney regarding he to request Court for further conference in January; forwarding to Mr. Janssen for comment; conferring with LJK and writing Mr. Davidson with suggestion to pursue recovery of costs of enforcing award from New York funds and procedure regarding same; |
| 12/11/07 | LJK | 1.50 | Review email from clients; office conference with MEU re legal strategy; draft response to clients; |
| 12/11/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 12/11/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/12/07 | MEU | 2.30 | Receiving and reviewing email from Mr. Davidson inquiring regarding time estimate for application for costs; receiving and reviewing email from Mr. Janssen regarding amounts due under awards, etc and response to HRC attorney claim regarding amounts due, over-security, etc; reviewing third arbitration award and other documents regarding sale of Banga Borat received from Mr. Janssen; on reply to HRC attorney regarding security and claims figures and response to suggestions for conference in January as premature given sales proceeds about to be distributed; writing to Mr. Davidson and Mr. Janssen reply to queries and outlining timing for motion for costs of collection actions from NY funds, etc; corresponding with LJK regarding same; |
| 12/12/07 | LJK | 2.30 | Email to MEU with further considerations re a possible application for fees/disbursements to include foreign fees/disbursements; office conference with MEU following receipt of further instructions; assist MEU in drafting responses to client inquiry; review email of opposing counsel to court; review email from opposing counsel and assist MEU in drafting response; begin draft of proposed declaration for MR. JANSSEN; |
| 12/12/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/12/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/13/07 | MEU | .30 | Writing to Mr. Davidson forwarding draft declaration in support of motion for costs; |
| 12/13/07 | LJK | 1.20 | Draft and revise declaration to Mr. Janssen re fees and disbursements; assist MEU in drafting letter to Mr. Janssen; |
| 12/13/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 12/17/07 -12/21/07; |
| 12/13/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/13/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/14/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/14/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 12/17/07 | MEU | .40 | Receiving and reviewing notice of \$10,865 restrained at Citibank; instructing bank to hold funds; preparing Rule B.2 notice of restraint to HRC attorney; writing Messrs. Davidson and Janssen reporting on same; |
| 12/17/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/17/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/18/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/18/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/19/07 | MEU | .50 | Receiving and reviewing e-mails from Mr. Janssen forwarding updated charts on Sea Con claims and security and advising regarding clients wish to pursue costs and declarations being prepared; receiving and reviewing e-mail from HRC attorney suggesting wire being sent to HRC Agencies Lanka Pvt.; writing HRC attorney forwarding swift received from Citibank; |
| 12/19/07 | LJK | .20 | Review emails from Mr. Janssen; assist MEU in drafting response; |
| 12/19/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/19/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/20/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/20/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/21/07 | LJK | .20 | Review email from Mr. Janssen; |
| 12/21/07 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 12/24/07 -1/4/08; |
| 12/21/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/21/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/22/07 | MEU | .30 | Receiving and reviewing e-mail from Mr. Janssen regarding revised statement of unsecured claims due to increased sheriff's fees; |

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| 12/24/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/24/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/26/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/26/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/27/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/27/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/28/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/28/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 12/31/07 | MEU | .20 | On exchange with Mr. Janssen regarding he to provide declaration in support of application for fees for both HFW offices; |
| 12/31/07 | LJK | .20 | Review email from Mr. Janssen; review response from MEU; |
| 12/31/07 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 12/31/07 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/02/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/02/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/03/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 1/7/08-1/11/08; |
| 1/03/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/03/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/04/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/04/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/07/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/07/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 1/08/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/08/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/09/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/09/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/10/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/10/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/11/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 1/14/08-1/18/08; |
| 1/11/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/11/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/14/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/14/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/15/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/15/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/16/08 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession; |
| 1/16/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/16/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/17/08 | MEU | .20 | On exchanges with Mr. Janssen regarding accounting for billed but unpaid fees in declaration; |
| 1/17/08 | LJK | .40 | Review inquiry from client; research and draft response to MEU; |
| 1/17/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |

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| 1/17/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/18/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 1/21/08-1/25/08; |
| 1/18/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/18/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/22/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/22/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/23/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/23/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/24/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 1/28/08-2/01/08; |
| 1/24/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/24/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/25/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/25/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/28/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/28/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/29/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/29/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/30/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/30/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 1/31/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon |

garnishee banks for 2/4/08-2/8/08;

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| 1/31/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 1/31/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/01/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/01/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/04/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/04/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/05/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/05/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/06/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/06/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/07/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/07/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/08/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 2/11/08-2/15/08; |
| 2/08/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/08/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/11/08 | MEU | .40 | Redrafting motion for costs; forwarding to Mr. Janssen for review; |
| 2/11/08 | CG | .20 | Reviewing responses from garnishee banks to interrogatories requesting information about defendant's assets in garnishee's possession (week of 2/4-2/11); |
| 2/11/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/11/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 2/12/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/12/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/13/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/13/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/14/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/14/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/15/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 2/18/08-2/22/08; |
| 2/15/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/15/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/19/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/19/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/20/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/20/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/21/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 2/25/08-2/29/08; |
| 2/21/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/21/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/22/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/22/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/25/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/25/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

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| 2/26/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/26/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/27/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/27/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/28/08 | JS | .10 | Daily receipt/review of acknowledgment and confirmation replies from secondary service upon garnishee banks; prepare service upon garnishee banks for 3/3/08 - 3/7/08; |
| 2/28/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/28/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |
| 2/29/08 | MC | .10 | Serving PMAG on garnishee banks by telefax; |
| 2/29/08 | MC | .10 | Serving PMAG in second action on garnishee banks by telefax; |

FEES: 4,559.00

SUMMARY OF PROFESSIONAL SERVICES:

| TIMEKEEPER | HOURS | RATE | AMOUNT |
|-------------------|-------|--------|----------|
| Michael E. Unger | 6.90 | 280.00 | 1,932.00 |
| Larry J. Kahn | 6.00 | 220.00 | 1,320.00 |
| Joan Sorrentino | 1.30 | 130.00 | 169.00 |
| Christina Gargano | .40 | 100.00 | 40.00 |
| Colford, Melissa | 12.20 | 90.00 | 1,098.00 |
| | 26.80 | | 4,559.00 |

DISBURSEMENTS:

| | | |
|-----------------------------|--------|--------|
| Photocopy Expenses | 42.00 | |
| Court Filing Fees | 9.84 | |
| Telephone Expenses | 7.43 | |
| Facsimile Expenses | 357.13 | |
| TOTAL DISBURSEMENTS: | | 416.40 |

INVOICE TOTALS:

| | |
|----------------|-------------|
| FEES: | \$ 4,559.00 |
| DISBURSEMENTS: | 416.40 |
| INVOICE TOTAL: | \$ 4,975.40 |

WIRE TRANSFER DETAILS:

Citibank, N.A.
120 Broadway
New York, NY 10271
SWIFT Code: CITIUS33
ABA No.: 021 000 089
FOR THE ACCOUNT OF
FREEHILL HOGAN & MAHAR
Account No. : 24589366
U.S. Dollars
Tax ID NO.: 13-1985797